

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | |
|---------------------------------------|---------------------------|
| ----- | X |
| HILLARY WRIGHT, | : |
| | : |
| | : No. 23 Civ. 7124 (AJC) |
| | : |
| Plaintiff, | : |
| | : |
| | : ECF Case |
| -against- | : |
| | : |
| | : NOTICE OF MOTION |
| | : |
| MAIL MEDIA INC., DMG MEDIA LTD, | : |
| ASSOCIATED NEWSPAPERS LTD, DAILY MAIL | : |
| AND GENERAL TRUST PLC, | : |
| | : |
| | : |
| Defendants. | : |
| | : |
| ----- | X |

PLEASE TAKE NOTICE that Defendants, upon the accompanying Memorandum of Law dated August 16, 2024, and all prior pleadings and proceedings hereto, by their undersigned attorneys, hereby respectfully move this Court, before the Honorable Andrew L. Carter Jr., United States District Judge, at the United States Courthouse, 40 Foley Square, Courtroom 1306, New York, NY 10007, for an order, pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing Plaintiff's First Amended Complaint in its entirety and granting such other relief as this Court deems appropriate.

Dated: August 16, 2024

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Thomas B. Sullivan

Thomas B. Sullivan

Anna Kaul

1675 Broadway, 19th Floor

New York, NY 10019

Telephone: (212) 850-6139

Facsimile: (212) 223-1942

sullivant@ballardspahr.com

kaula@ballardspahr.com

Kennison Lay (admitted *pro hac vice*)

1 E. Washington St., Suite 2300

Phoenix, AZ 85004

Telephone: (602) 798-5573

Facsimile: (602) 798-5596

layk@ballardspahr.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of August 2024, I directed that a true and correct copy of the foregoing **NOTICE OF MOTION** be filed via the court's electronic filing system.

/s/ Thomas B. Sullivan
Thomas B. Sullivan